

Lessons Learned and Program Operations Session

The National Environmental Performance Track

Improving the Achievement Track

December 13, 2000

Washington Hilton Hotel, Washington DC

Introduction

Participants in the Lessons Learned and Program Operations session discussed three main topics: getting the word out to potential Achievement Track companies, the application process, and program operations. EPA representatives presented the topics for discussion. Eleven people attended the session, six of whom were non-EPA participants from various companies or organizations.

Purpose of Session

EPA wanted feedback on the operations of the Achievement Track program during its first six months. Was EPA responsive? Did EPA answer questions satisfactorily? What could EPA improve on? What other program requirements should EPA incorporate into Achievement Track in the future? The discussion focused on three topics: getting the word out about Achievement Track, the Achievement Track application process, and program operations

Getting the Word Out About the Achievement Track

Many participants learned about the program only by chance. They believed that the program should be promoted more broadly and visibly. Participants suggested contacting consulting firms that have a large customer base to obtain company's names and information. They added that EPA could announce the program, its milestones and activities on the EPA website and States' websites. EPA suggested announcing the Achievement Track at trade association meetings. Participants agreed that these methods of advertising would be effective in getting the attention of potential companies and introducing them to a worthwhile program.

Application Process

The group agreed that the application was straightforward and that companies do not resist applying to Achievement Track. Companies apply because there is no downside or risk associated with the program. Participants agreed that EPA was helpful throughout the application process. Some believed that one-on-one conversations, website guidance, and the half-day workshop in Region 1 proved especially helpful.

Program Requirements

Some of the participants were concerned about what would happen if their companies were not be able to meet the performance commitments included in their applications. Participants were also concerned about any prospective modification of performance requirements by EPA. EPA stated that Program policy is not fully developed in this area, but EPA does not intend to treat proposed performance commitments as requirements that must be achieved by a date certain to remain in the Program. Initially, EPA will look for good faith efforts to meet performance commitments. In response to questions about the compliance screen, EPA explained that failure to pass the screen is triggered by three or more significant violations in the last three years, or any ongoing civil or criminal issues. EPA added that most companies know if they are going to meet the application compliance criteria.

Performance Areas

Participants expressed conflicting opinions about standardizing the environmental performance information that Achievement Track facilities submit. EPA wants to be able to aggregate and compare facility information and intends to specify a reporting format to be used by everyone. Some participants opposed a standard format, arguing that it would be difficult for them to change methods they have used for years, and that changes would cause discontinuities in their records over time. They also pointed out that this would complicate their efforts to use

historical baselines. EPA agreed that these concerns were valid, but pointed out that over time, it is essential that measurements be standardized.

Program Operations

EPA representatives explained how the Achievement Track program will operate. An information packet will be distributed to participants and that a draft version will be developed and tested with volunteer companies. Participants then discussed EPA site visits, an early draft of the annual reporting form, an Achievement list serve, program sponsors, communications, and future Achievement Track meetings.

Site Visits

EPA explained that a site visit would be approximately one day in length, depending on the size of the facility, and would include checks on the Environmental Management System (EMS) operations, facility efforts to comply with the program, public outreach, employee interviews, and a review of documentation. One participant suggested that EPA provide a checklist and an agenda for the company to be able to prepare for the visit. A summary describing what was seen on site visits would be useful in assisting with continuous improvement of the company's EMS. EPA agreed that this approach would better ensure system integrity, confidence and uniformity, and help facility employees understand EPA's measurement practices. One participant suggested a feedback system consisting of three categories: observations, important notices, and holds.

Draft Annual Reporting Form

EPA presented an overview of the draft Annual Reporting Form. Participants agreed that the form seemed straightforward and not overly burdensome. They asked whether submission could be done in conjunction with a company's internal reporting cycles. EPA said that this probably could be included when the Agency finalizes the reporting schedule. EPA will email a draft Annual Reporting Form to all participants for feedback in the next few weeks.

Achievement Participant List Serve and E-mails

The group suggested setting up a list serve for Achievement Track participants to broadcast Achievement Track updates and to receive feedback from participants about the program. Some participants suggested that this also be done on a regional basis so that EPA's regional coordinators can communicate with participating companies in their regions.

All agreed that email would be a sufficient communication device as long as there was not an overflow of weekly email. The group decided that all e-mails should be sent through the EPA Regions to build relationships at regional levels and to encourage national consistency.

Program Sponsors

Participants emphasized the value of having all levels of government actively involved in the Program. The national, regional and local influences would help companies establish relationships at all of those levels so that a company's activities are well known at all levels of government.

Meetings

Participants agreed that Achievement Track meetings should be held biannually and regionally, but not nationally. The smaller regional meetings would help with building relationships and continuous improvement of Achievement Track companies. The next Achievement Track meetings should discuss what has been accomplished throughout the year.

Conclusion

The main group recommendation was to enhance communications to among the EPA's Achievement Track staff and its participants, non-Achievement Track companies, and the community. The group suggested to improve Program communications by using EPA and States' websites, biannual regional meetings and by setting up a list serve, all of which can act as devices for Program updates and information, and as a forum for participants to voice comments or concerns.

Participants believe that Program operations can be improved to include feedback on site visits to promote "continuous improvement" in companies. Additionally, all of the participants emphasized the importance of having national, regional and local levels of government actively involved in the Program, to help Achievement Track companies build relationships at all levels.